

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

**THIS DOCUMENT RELATES TO:**

### *All Actions*

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**[PROPOSED] ORDER GRANTING  
META'S ADMINISTRATIVE MOTION  
FOR LEAVE TO FILE SUPPLEMENTAL  
BRIEFING ON FORMER EMPLOYEES'  
OBJECTIONS TO META'S DOCUMENT  
SUBPOENAS IN LIEU OF PROPOSED  
ORDER**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1 On March 31, 2025, Defendants Meta Platforms, Inc.; Facebook Holdings, LLC; Facebook  
 2 Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus,  
 3 Inc. (collectively, “Meta”) submitted Meta’s Administrative Motion For Leave to File Supplemental  
 4 Briefing on Former Employees’ Objections to Meta’s Document Subpoenas in Lieu of Proposed Order  
 5 (“Motion”). Third parties Arturo Bejar and Vaishnavi Jayakumar (“Former Employees”) [filed no timely  
 6 opposition to the Motion] [filed an opposition to the Motion on  
 7 \_\_\_\_\_].

8 Having reviewed the Motion, [the opposition], and all supporting papers, the Court hereby  
 9 **ORDERS** that the Motion is **GRANTED**. *See* Standing Order for Discovery in Civil Cases Before  
 10 Magistrate Judge Peter H. Kang ¶ H(4) (“This Court may . . . request additional or more fulsome briefing”  
 11 before resolving a discovery dispute). The Court **ORDERS** Meta and the Former Employees to file  
 12 supplemental briefs addressing the application of the First Amendment of the U.S. Constitution, 18  
 13 U.S.C.A. § 1514A, and California Labor Code § 1102.5 to Meta’s Request for Production of Documents  
 14 (“RFP”) Nos. 2 and 10 to Mr. Bejar, and Meta’s RFP Nos. 1 and 2 to Ms. Jayakumar, pursuant to the  
 15 following briefing schedule and page limits:

16 1. Meta’s supplemental brief (10 pages double-spaced): 7 days after the date of this Order  
 17 2. Former Employees’ supplemental response (10 pages double-spaced): 7 days after Meta’s  
 18 supplemental brief is filed  
 19 3. Meta’s reply brief (5 pages double-spaced): 3 days after Former Employees’ supplemental  
 20 response is filed

21 This supplemental briefing shall be in lieu of the proposed order requested by the Court at the  
 22 March 20, 2025 Discovery Management Conference. *See* 3/20/2025 DMC Tr. at 114:10–12.

23  
 24 **IT IS SO ORDERED.**

25  
 26 DATED:

27 \_\_\_\_\_  
 28 Hon. Peter H. Kang  
 United States Magistrate Judge